

10/17/08

RESPONSE TO SECTION 104(e) INFORMATION REQUEST

Respondents: Wells Trucking & Leasing, Inc.

Site: 7265 Second Avenue South
Seattle, WA 98108

King County Parcel: 6871200750

Date: 1997 to present

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OCT 17 2008

Environmental
Cleanup Office**INFORMATION REQUEST QUESTIONS****1. Respondent Information**

- a. Christie Wells
12677 E. Marginal Way S
Seattle, WA 98108
(206) 762-5330
- b. Robie G. Russell
Russell Law Offices
76 South Main Street
Seattle, WA 98104
(206) 621-2102 O
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robiegruss@aol.com
- c. Please send all future correspondence to Russell Law Offices at the above address.
- d. The property located at 7265 Second Avenue South ("Site") was rented by Respondents on a month to month basis commencing October 1, 2002 and ending March 31, 2005. Respondents do not rent or own any other property in this general vicinity.
- e. Respondents engaged in business activity on the Site from October 1, 2002 to March 31, 2005.
- f. Respondents operated a truck terminal which included truck parking and business offices. Respondents performed routine vehicle maintenance services such as oil changes and chassis lubrication at the Site. All other work including vehicle fueling was done off-site. Used motor oil was placed in a waste oil tank which was emptied on a periodic basis by a waste oil recycler. To the best of Respondents' knowledge no spills or releases occurred during their tenancy.

USEPA SF**1337173**

- g. Materials or products used and/or stored at the Site included lubricants and associated automotive products in their original containers. Respondents also handled commercial motor freight at the Site for short periods of time prior to delivery. All motor freight was packaged or containerized by the original shippers and remained so until after delivery.
- h. Bankruptcy -- DNA

2. Site Activities and Interests

- a. *Provide all documents in your possession regarding the ownership or environmental conditions of the property mentioned above, including, but not limited to, copies of deeds, sales contracts, leases, blueprints, "as-builts" and photographs.*

Respondents rented the Site on a month to month basis. As such, they did not possess or have access to any documents related to the ownership or environmental condition of the Site.

- b. *Provide information on the condition of the property when purchased; describe the source, volume, and content of any fill material used during the construction of the buildings, including waterside structures such as seawalls, wharves, docks, or marine ways.*

Respondents rented the Site on a month to month basis. As such, they did not possess or have access to any documents related to the ownership or environmental condition of the Site.

- c. *Provide information on past dredging or future planned dredging at this site.*

Respondents have no knowledge or any past or planned future dredging.

- d. *Provide a brief summary of the activities conducted at the site while under Respondent's ownership or operation. Include process diagrams or flow charts of the industrial activities conducted at the site.*

The primary activity of the Respondents at the Site was the handling and transport of motor freight. No processing of materials or other similar activity took place on the Site.

- e. *Provide all documents pertaining to sale, transfer, delivery, disposal, of any hazardous substances, scrap materials, and/or recyclable materials to this property.*

To the best of Respondents' knowledge, no hazardous substances, scrap materials, or recyclable materials (as that term is commonly understood) were transferred, delivered, disposed of, or sold at the Site.

- f. *Provide all information on electrical equipment used at the facility, including transformers or other electrical equipment that may have contained polychlorinated biphenyls (PCBs).*

To the best of Respondents' knowledge, there were no electrical transformers located on or used at the Site. All electrical power was supplied by Seattle City Light directly to standard electrical power circuit breaker panels via power poles and standard electrical wiring.

- g. *Provide information on the type(s) of oils or fluids used for lubrication of machinery or other industrial purposes, and any other chemicals or products which are or may contain hazardous substances which are or were used at the facility for facility operations.*

To the best of Respondents' knowledge, the materials or products used at the Site included motor oil, chassis lubricants, and other associated automotive products in their original containers.

- h. *Provide any site drainage descriptions, plans or maps that include information about storm drainage which includes, but is not limited to, above or below surface piping, ditches, catch basins, manholes, and treatment/detention or related structures including outfalls. If available, also include information about connections to sanitary sewer.*

Respondents do not have nor are they aware of any responsive documents.

- i. *With respect to past site activities, please provide copies of any stormwater or drainage studies, including data from sampling, conducted at these properties. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans that may have been developed for different operations during the Respondent's occupation of the property.*

Respondents do not have nor are they aware of any responsive documents.

3. Information About Others

- a. Describe any business relationship you may have had regarding this property or operations thereon with the following entities:

- i. **Bill's Mobile Service, LLC** -- provide truck repair services to Respondents.
- ii. **Boyer Towing** -- landlord for the Site.
- iii. **CCK Partnership** -- no known business relationship.
- iv. **DiOrio Construction** -- no known business relationship.

- v. **Emerald City Transport** -- no known business relationship.
- vi. **Petro Alaska** -- no known business relationship.
- vii. **Southpark Truck & Trailer Repair** -- no known business relationship.

b. *Provide the names and last known address of any tenants or lessees, the dates of their tenancy and a brief description of the activities they conducted while operating on the above mentioned site.*

Respondents rent the Site on a month to month basis. As such, they have no knowledge of any other tenants or lessees.

c. *If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous materials to or from, the Site.*

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(206) 762-5330

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Other than the previously identified commercial automotive products, no hazardous materials were generated, used, purchased, stored, disposed of, placed, or handled at the Site.

4. Financial Information

a. *Provide true and complete copies of all federal income tax documents, including all supporting schedules for 2002, 2003, 2004, 2005, 2006 and 2007. Provide the federal Tax Identification Number and, if documentation is not available, explain why in detail.*

Available financial records are attached as Exhibit "A".

b. *Provide the Respondent's financial interest in, control of, or that the Respondent is a beneficiary of any assets (in the U.S. or in another country) that have not been identified in your federal tax returns or other financial information to be presented to EPA. If there are such assets, please identify each asset by type of asset, estimated value, and location.*

DNA

c. *If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:*

DNA

5. Insurance Coverage

a. *Provide copies of all property, casualty and/or liability insurance policies, and any other insurance contracts referencing the site or facility and/or Respondent's business operations (including, but not limited to, Comprehensive General Liability, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies). Include, without limitation, all primary, excess, and umbrella policies which could be applicable to costs of environmental investigation and/or cleanup, and include the years such policies were in effect.*

Available Insurance documents are attached as Exhibit "B."

b. *If there are any such policies from question "5 a" above which existed, but for which copies are not available, identify each such policy by providing as much of the following information as possible:*

DNA

c. *Identify all insurance brokers or agents who placed insurance for the Respondent at any time during the period being investigated, as identified at the beginning of this request, and identify the time period during which such broker or agent acted in this regard.*

Tom Graves, Farmers Insurance, Seattle, Washington

d. *Identify all communication and provide all documents that evidence, refer, or relate to claims made by or on behalf of the Respondent under any insurance policy in connection with the site. Include any responses from the insurer with respect to any claims.*

Respondents do not have nor are they aware of any responsive documents.

e. *Identify any previous settlements with any insurer in connection with the site, or for any claims for environmental liabilities during the time period under investigation. Include any policies surrendered or cancelled by the Respondent or insurer.*

The Respondents are not aware of any such claims or settlements.

- f. *Identify any and all insurance, accounts paid or accounting files that identify Respondent's insurance policies.*

Please refer to Response to 5a above.

- g. *Identify Respondent's policy with respect to document retention.*

Respondents maintain copies of current business documents at their place of business. Retention periods vary depending upon the nature of the document and pertinent law.

6. Compliance with This Request.

- a. *Describe all sources reviewed or consulted in responding to this request, including, but not limited to:*

- i. *the name and current job title of all individuals consulted;*

Christie Wells, owner

- ii. *the location where all documents reviewed are currently kept.*

12677 E. Marginal Way S, Seattle, WA 98108

DECLARATION

I declare under penalty of perjury pursuant to the laws of the State of Washington that I am authorized to respond on behalf of the Respondents herein and that the foregoing is complete, true, and correct to the best of my knowledge.

Dated this _____ day of October, 2008 at Seattle, Washington.

Christie Wells
12677 E. Marginal Way S
Seattle, WA 98108